

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:** **INDUSTRIAL & CRANE SERVICES, INC.** **CHAPTER 11**  
**Debtor** **CASE NO. 20-51464-KMS**

**FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF NECESSARY EXPENSES FOR CRAIG M. GENO**

COMES NOW the Craig M. Geno, the Subchapter V Trustee in this case (the “Trustee” or “Mr. Geno”), and files this his *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Craig M. Geno* (the “Application”), and in support thereof, would show as follows:

1. On October 5, 2020, the United States Trustee filed a Notice of Appointment of Subchapter V Trustee [DK #21] appointing Craig M. Geno as the Subchapter V Trustee in this case.
2. The substantial services rendered by Mr. Geno as Subchapter V Trustee and the expenses incurred by the Trustee benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as Exhibit “A”. The Affidavit also certifies and represents to the Court that the services rendered by the Trustee were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as Exhibit “B” and incorporated by reference.
3. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by the Trustee in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the Trustee’s obligations herein; and they represent normal and customary fees and expenses incurred and charged for trustees in

similar cases. The time, skill and experience utilized by the Trustee justify the approval of the Application.

4. This is the Trustee's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from October 5, 2020, to and including August 18, 2021, and is for the sum of \$18,518.28 (\$18,480.00 in fees and \$38.28 in expenses).

WHEREFORE, PREMISES CONSIDERED, the Trustee requests that this Court enter an Order awarding reasonable trustee's fees for the professional services rendered herein and authorizing and directing the Debtor to pay said trustee's fees and expenses. The Trustee prays for general relief.

THIS, the 23<sup>rd</sup> day of August, 2021.

Respectfully submitted,

CRAIG M. GENO, SUBCHAPTER V TRUSTEE

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)

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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Abigail M. Marbury, Esq.  
Office of the United States Trustee  
abigail.m.marbury@usdoj.gov

Patrick A. Sheehan, Esq.  
pat@sheehanramsey.com

THIS, the 23<sup>rd</sup> day of August, 2021.

*/s/ Craig M. Geno*

Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:** **INDUSTRIAL & CRANE SERVICES, INC.** **CHAPTER 11**  
**Debtor** **CASE NO. 20-51464-KMS**

**EXHIBIT “A”**

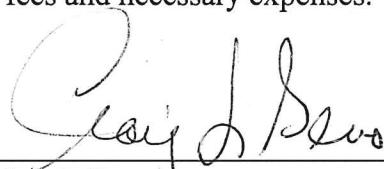
IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: INDUSTRIAL & CRANE SERVICES, INC.  
Debtor

CHAPTER 11  
CASE NO. 20-51464-KMS

AFFIDAVIT

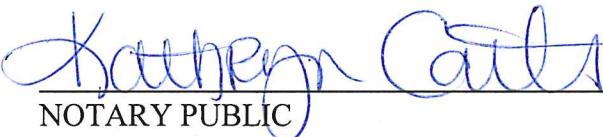
PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, the Subchapter V Trustee, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Craig M. Geno* (the "Application"), Subchapter V Trustee, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.

  
\_\_\_\_\_  
Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 23<sup>rd</sup> day of August, 2021.



  
\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES JUNE 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: INDUSTRIAL & CRANE SERVICES, INC. CHAPTER 11  
Debtor CASE NO. 20-51464-KMS**

**EXHIBIT “B”**

***Law Offices of Craig M. Geno, PLLC***  
 587 Highland Colony Parkway  
 Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

Industrial & Crane Services, Inc.  
 MS-Mississippi  
 USA

August 23, 2021

**Attention:** File #: T20006  
 Inv #: 347586

**RE:** Subchapter V Trustee

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-05-20	Dictation of Verified Statement	0.10	25.00	CMG
	Assist CMG drafting New Client Data Sheet, Verified Statement of Subchapter V Trustee	0.20	30.00	KLC
Oct-07-20	Assist CMG setting up file	0.15	22.50	KLC
Oct-09-20	Review numerous memos to/from Ms. Marbury, Mr. Reiland, Mr. Sheehan regarding IDI & 341.	0.50	125.00	CMG
	Review Court notice re 341	0.20	50.00	CMG
Oct-11-20	Review deficiency notice	0.10	25.00	CMG
Oct-12-20	Review Notice from S. Wells.	0.10	25.00	CMG
	Receipt and review of Notice of Meeting of Creditors; calendar various deadlines	0.15	22.50	KLC
Oct-13-20	Review memos to/from Barret Arthur re interest in assets	0.15	37.50	CMG
Oct-14-20	Telephone conference with P. Sheehan regarding bankruptcy	0.15	37.50	CMG
	Attended IDI.	0.85	212.50	CMG

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	Review memo from P. Sheehan, P. Reiland regarding IDI follow up, proof of insurance.	0.25	62.50	CMG
	Review IDI materials; tax return and financial documents; prepare for IDI	0.65	162.50	CMG
Oct-15-20	Review Motion/ Order regarding Schedules Extension.	0.20	50.00	CMG
	Review Chatham Steel POC.	0.20	50.00	CMG
Oct-16-20	Telephone conference with P. Sheehan regarding payment from controlled account to subcontractor.	0.25	62.50	CMG
	Receipt and review of Order Granting Debtor Additional Time to File Schedules and Statements; calendar deadline for Debtor to file schedules, etc.	0.10	15.00	KLC
Oct-19-20	Review memo from Ms. Marbury regarding court appearance on 11/5	0.05	12.50	CMG
Oct-20-20	Review Grainger POC.	0.10	25.00	CMG
	Review FlexForce POC.	0.00	0.00	CMG
Oct-30-20	Review Notice from Flex Force	0.20	50.00	CMG
Nov-02-20	Review notice - GEDA Elevator	0.10	25.00	CMG
	Review memos to/from Ms. Marbury, Mr. Sheehan re schedules and 341 meeting rescheduled	0.25	62.50	CMG
	Review Agreed Scheduling Order	0.10	25.00	CMG
Nov-04-20	Attended telephonic 341 meeting	1.00	250.00	CMG
	Receipt and review of Agreed Scheduling Order; calendar deadline for Debtor to file SubV Plan	0.10	15.00	KLC
	Receipt and review of Minutes from Meeting of Creditors; calendar rescheduled meeting date to trigger preparation of hearing folder	0.10	15.00	KLC
Nov-05-20	Review Airgas proof of claim	0.10	25.00	CMG

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	Attended status conference	0.15	37.50	CMG
	Telephone conference with Pat Sheehan re status conference	0.10	25.00	CMG
	Review minute entry	0.10	25.00	CMG
Nov-06-20	Review proof of claim re Landstar Ranger	0.35	87.50	CMG
Nov-12-20	Review and study schedules and statement of affairs	1.25	312.50	CMG
	Telephone conference with Pat Sheehan re payments from control account; engagement in Philadelphia PA for special counsel and related issues	0.30	75.00	CMG
	Review memo from Abigail Marbury re 341 procedure	0.10	25.00	CMG
Nov-13-20	Review memos from Tim Anzenberger; Abigail Marbury re 341 transcript	0.10	25.00	CMG
	Review motion to reject	0.30	75.00	CMG
	Review memo from Abigail Marbury, 341 outline	0.15	37.50	CMG
	Receipt and review of Notice re Debtor's Motion to Reject Unexpired Personal Property Leases	0.10	15.00	KLC
Nov-16-20	Review UST 341 notes	0.10	25.00	CMG
	Review application and notice to employ special counsel	0.25	62.50	CMG
Nov-17-20	Review proof of claim from Williams Scotsman	0.25	62.50	CMG
	Receipt and review of Notice re Debtor's Application to Employ Special Counsel; calendar objection deadline	0.10	15.00	KLC
Nov-19-20	Review notice from World Scaffold	0.10	25.00	CMG
Nov-23-20	Review amended petition and schedules	0.55	137.50	CMG

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	Receipt and review of Notice of Amendment to Schedules; calendar various deadlines	0.15	22.50	KLC
Dec-03-20	Review World Scaffold proof of claim	0.35	87.50	CMG
Dec-04-20	Review Motion to Reject	0.20	50.00	CMG
Dec-07-20	Review Motion Industries proof of claim	0.25	62.50	CMG
Dec-09-20	Review Order rejecting lease	0.05	12.50	CMG
Dec-14-20	Review memos to/from Ms. Marbury; Mr. Sheehan re timely monthly operating reports	0.20	50.00	CMG
Dec-15-20	Review notice from Signet Maritime	0.10	25.00	CMG
	Review memo from Pat Sheehan re monthly operating report filing	0.05	12.50	CMG
Dec-17-20	Review Certificate of Service re GEDA motion	0.10	25.00	CMG
	Review Clerk's 4001 memo	0.15	37.50	CMG
	Review hearing notice re GEDA motion	0.20	50.00	CMG
	Receipt and review of hearing notice re GEDA USA Elevator's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Dec-21-20	Telephone conference with Pat Sheehan re employment of special counsel, critical vendor issue and related matters	0.25	62.50	CMG
Dec-23-20	Review October MOR	0.25	62.50	CMG
	Receipt and review of Notice re Debtor's Application to Employ Special Counsel Dogan & Wilkinson; calendar objection deadline	0.10	15.00	KLC
Dec-27-20	Review Application to Employ	0.45	112.50	CMG
	Review Notice re Application to Employ	0.10	25.00	CMG
Dec-28-20	Review notice of hearing on C.V. motion	0.20	50.00	CMG

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	Review notice re 1/14 hearing	0.10	25.00	CMG
	Receipt and review of hearing notice re Debtor's Emergency Motion Requesting Designation of Critical Vendor; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Dec-29-20	Receipt and review of hearing notice re Debtor's Motion to Set Aside Order Approving Rejection of Unexpired Leases of Personal Property and Withdraw Motion to Reject Leases; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Dec-30-20	Dictation of memo to Abigail Marbury re Plan	0.05	12.50	CMG
	Review Motion to Set Aside	0.20	50.00	CMG
Jan-04-21	Receipt and review of Order re Subchapter V Plan; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Jan-05-21	Review critical vendor motion	0.55	137.50	CMG
	Telephone conference with Pat Sheehan re critical vendor motion	0.15	37.50	CMG
	Review hearing notice re critical vendor motion	0.15	37.50	CMG
	Dictation of response to critical vendor motion	0.40	100.00	CMG
	Review and revision of response to critical vendor motion	0.20	50.00	CMG
	Review hearing notices re Plan and confirmation	0.20	50.00	CMG
	Review Clerk's letter re Plan confirmation and notices	0.10	25.00	CMG
	Review file and court docket re: 1/6/21 hearing on Debtor's Emergency Motion Requesting Designation of Critical Vendor; prepare hearing folder for same	0.20	30.00	KLC

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	Assist CMG drafting and revising Response to Debtor's Emergency Motion Requesting Designation of Critical Vendor	0.30	45.00	KLC
Jan-06-21	Review minute entry	0.10	25.00	CMG
Jan-07-21	Review GEDA motion Dictation of Answer to GEDA motion Review and revision of Trustee Answer Review order re C.V. Review COS re confirmation hearing Assist CMG drafting Objection to GEDA Motion for Relief	0.75 0.65 0.35 0.10 0.10 0.40	187.50 162.50 87.50 25.00 25.00 60.00	CMG CMG CMG CMG CMG KLC
Jan-13-21	Review Amended MTLS of GEDA and Response/Reply of GEDA Review memos to/from Tim Anzenberger re resolving the MTLS Review memos to/from Tim Anzenberger re continuance Review file and court docket re: 1/14/21 hearing on GEDA USA Elevator's Motion for Relief from Stay; prepare hearing folder for same	0.35 0.20 0.10 0.40	87.50 50.00 25.00 60.00	CMG CMG CMG KLC
Jan-14-21	Review memos to/from Tim Anzenberger re status of MTLS Attended hearing on MTLS Review minute entry	0.20 0.45 0.15	50.00 112.50 37.50	CMG CMG CMG
Jan-18-21	Telephone conference with Pat Sheehan re critical vendor status ruling, lift stay result	0.10	25.00	CMG
Jan-21-21	Review memo from Abigail Marbury re missing MORs Review POC from Connolly Gallagher	0.05 0.20	12.50 50.00	CMG CMG

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Jan-23-21	Review notice from Kocks Krane GmBH	0.10	25.00	CMG
	Review November 2020 MOR	0.60	150.00	CMG
	Dictation of memo to Pat Sheehan re revenue misses	0.10	25.00	CMG
Jan-25-21	Review memo from Tim Anzenberger and review revised stay order	0.20	50.00	CMG
Jan-27-21	Review Phelps Dunbar POC	0.10	25.00	CMG
Jan-28-21	Review POC of Astro Holdings	0.35	87.50	CMG
Jan-29-21	Brief review of US Specialty Insurance POC	0.30	75.00	CMG
	Review Airgas POC	0.10	25.00	CMG
	Review Kocks Krane POC	0.50	125.00	CMG
	Review Atlantic Specialty Insurance POC	0.10	25.00	CMG
	Review Notice - Atlantic Specialty Insurance & Kocks Krane	0.15	37.50	CMG
	Review order setting aside	0.10	25.00	CMG
	Review BrandSafway POC	0.10	25.00	CMG
	Brief review of SureTec POC; Review underlying documents and supporting exhibits	0.40	100.00	CMG
	Review Maxim Crane POC	0.35	87.50	CMG
Feb-01-21	Review Sautter Crane POC	0.20	50.00	CMG
Feb-08-21	Telephone conference with Pat Sheehan re Delaware litigation	0.20	50.00	CMG
	Telephone conference with Kristi Johnson and co-counsel re Plan issues, litigation in Delaware and prospects for lifting stay, Plan/claim estimation issues and problems, Plan/claim estimation for voting purposes and possible mediation of issues	0.85	212.50	CMG

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Feb-17-21	Review memo from Abigail Marbury re missing documents	0.05	12.50	CMG
Feb-23-21	Review memo from Kristi Johnson re case/plan status	0.01	2.50	CMG
	Telephone conference with Pat Sheehan re case/plan status, claim estimation procedure for voting purposes and valuations	0.15	37.50	CMG
	Dictation of Motion for Status Conference; Review and revision of same	0.50	125.00	CMG
	Review Notice re Motion for Status Conference	0.20	50.00	CMG
	Telephone conference with Abbie Marbury re status conference issues	0.20	50.00	CMG
	Review bonding company plan proposal and memos re same to/from Pat Sheehan	0.45	112.50	CMG
	Review memos to/from Paul Murphy re claim [secured/unsecured] of Hancock, collateral value and related issues	0.20	50.00	CMG
	Review hearing notice re status conference	0.20	50.00	CMG
	Review memo from KLC re cancellation and reset of status on March 4	0.20	50.00	CMG
	Telephone conference with Abigail Marbury re case status; Review memo from Pat Sheehan re case status and reason for status conference	0.30	75.00	CMG
	Renewed review of objections to Plan	0.15	37.50	CMG
	Review and study Plan	1.10	275.00	CMG
	Assist CMG in drafting motion for a status conference; ECF filing re same	0.30	45.00	SLP
Feb-24-21	Review memos from Pat Sheehan, Johnathan Ord re case status, Plan, objections and viability	0.15	37.50	CMG
	Dictation of Plan Response	1.00	250.00	CMG
Feb-25-21	Review memos to/from Pat Sheehan, Chase Pritchard, counsel for USSI re settlement	0.65	162.50	CMG

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proposal of USSI claims; Review USSI settlement proposal and comment on it, officer compensation issues

	Review and revision of response to Plan	0.60	150.00	CMG
	Telephone conference with Pat Sheehan re response to Plan, other objections, results of status conference with USSI and related issues	0.15	37.50	CMG
	Assist CMG drafting Order on Motion for Status Conference	0.10	15.00	KLC
	Assist CMG drafting and revising Response to Debtor's SubV Plan	0.55	82.50	KLC
Feb-26-21	Review USSI notice	0.10	25.00	CMG
	Receipt and review of Debtor's 1st Fee Application for Attorney Sheehan; calendar objection deadline	0.10	15.00	KLC
Feb-28-21	Brief review of fee application, notice of Pat Sheehan	0.15	37.50	CMG
	Review Delaware POC filed by Kochs Krane	0.20	50.00	CMG
	Review memo from Pat Sheehan rejecting USSI's offer and draft language	0.20	50.00	CMG
Mar-01-21	Review Chapter 11 Ballot Certification	0.10	25.00	CMG
Mar-02-21	Review January 2021 MOR	0.55	137.50	CMG
Mar-03-21	Telephone conference with Mr. Sheehan re status conference, claim estimation, discovery and reset confirmation hearing	0.20	50.00	CMG
Mar-04-21	Review and revision of itemizations	0.35	87.50	CMG
	Attended status conference	0.50	125.00	CMG
	Review minute entry	0.10	25.00	CMG
	Receipt and review of Minute Entry re status conference on Debtor's Subchapter V Plan; calendar deadline for Debtor to file amended	0.15	22.50	KLC

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	Subchapter V plan and hearing date to trigger preparation of hearing folder			
	Assist CMG reviewing and revising itemizations	0.20	30.00	KLC
Mar-05-21	Review memo from Paul Murphy re Hancock perfection documents	0.15	37.50	CMG
Mar-08-21	Assist CMG reviewing and revising itemizations	0.20	30.00	KLC
Mar-11-21	Review memo from Gary Bressler re review of plan amendments	0.05	12.50	CMG
Mar-12-21	Telephone conference with Kristi Johnson re terms of offer	0.10	25.00	CMG
	Review IRS POC	0.30	75.00	CMG
	Dictation of memo to Pat Sheehan re failure to file FICA returns	0.20	50.00	CMG
Mar-13-21	Dictation of memo to Pat Sheehan re IRS POC	0.20	50.00	CMG
Mar-17-21	Review memo from Kristi Johnson re settlement proposal	0.20	50.00	CMG
	Telephone conference with Kristi Johnson re details of settlement	0.20	50.00	CMG
	Review memo from Kristi Johnson re confirming settlement details	0.20	50.00	CMG
	Telephone conference with Pat Sheehan re settlement, terms of treatment of various claims, discussed secured status and administrative status of various bond claimants	0.55	137.50	CMG
	Review draft motions to estimate	0.20	50.00	CMG
Mar-18-21	Review memos to/from Pat Sheehan re treatment of bonding company in plan	0.15	37.50	CMG
	Review memo from Ray Lemisch re plan amendments	0.05	12.50	CMG
	Review memo from Pat Sheehan re modifying Kocks Krane language to include USSI objection	0.25	62.50	CMG

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Mar-22-21	Review order setting Plan for trial	0.25	62.50	CMG
Mar-23-21	Receipt and review of Order Fixing Time for Filing Acceptances/Rejections to Debtor's Amended SubV Plan; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Mar-24-21	Review memos to/from Pat Sheehan, Kristi Johnson re plan issues	0.15	37.50	CMG
	Telephone conference with Pat Sheehan re Kocks Krane and USSI objections, tax claims and classification	0.20	50.00	CMG
Mar-26-21	Review COS re plan	0.15	37.50	CMG
	Review memos to/from Pat Sheehan, company reps re GEDA proposal	0.25	62.50	CMG
Apr-07-21	Review memos to/from Kristi Johnson, Ray Lemisch, Pat Sheehan re limiting notice	0.20	50.00	CMG
Apr-13-21	Review memo from Kristi Johnson re offer to prepare consent order for Kocks Krane plan issues	0.10	25.00	CMG
	Review January MOR	0.65	162.50	CMG
Apr-15-21	Review memos to/from Kristi Johnson re new litigation developments	0.10	25.00	CMG
	Review memo from Pat Sheehan re revisions from Ray Lemisch re Kocks Krane, et al. claims and related matters	0.20	50.00	CMG
Apr-16-21	Telephone conference with Kristi Johnson & Kocks Krane co-counsel re settlement developments, implementation of settlement and related issues	0.65	162.50	CMG
	Review new, revised terms from Gary Bressler re bond claims	0.20	50.00	CMG
	Telephone conference with Pat Sheehan re Kocks Krane settlement	0.20	50.00	CMG
	Telephone conference with Chase Pritchard re settlement terms and IRS claims v. Kocks Krane and others	0.20	50.00	CMG

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	Dictation of memo to Pat Sheehan re bond claim language and acceptance or rejection of bond	0.20	50.00	CMG
	Review memo from Pat Sheehan; Review settlement proposal from Whitney	0.25	62.50	CMG
Apr-19-21	Telephone conference with Paul Murphy (vm) re continuance	0.10	25.00	CMG
	Review memos to/from Kristi Johnson re follow up to Delaware litigation settlement issues	0.20	50.00	CMG
	Telephone conference with Pat Sheehan re Delaware settlement issues	0.25	62.50	CMG
Apr-20-21	Review numerous memos to/from Kocks Krane counsel, Pat Sheehan, Chase Pritchard re Kocks Krane proposed settlement	0.75	187.50	CMG
	Telephone conference with Pat Sheehan, Chase Pritchard re terms of settlement, need for cash from Kocks Krane contract proceeds	0.25	62.50	CMG
	Conference call with Kocks Krane counsel, Chase Pritchard, Pat Sheehan re settlement terms and questions and answers re it	0.65	162.50	CMG
Apr-21-21	Review memos to/from Pat Sheehan, A. Shapiro re logistics	0.10	25.00	CMG
	Conference call with Pat Sheehan, A. Shapiro (Delaware counsel) re Kocks Krane settlement	0.45	112.50	CMG
	Telephone conference with Pat Sheehan (2); Review memos from Chase Pritchard re settlement demands with Kocks Krane and DOL	0.30	75.00	CMG
	Conference call with Kocks Krane legal team, Pat Sheehan re rejection of settlement and reasons for rejection, procedures going forward	0.40	100.00	CMG
	Review memo from Kristi Johnson re confirming procedures and timeline going forward	0.20	50.00	CMG
Apr-22-21	Review memos to/from Pat Sheehan, Gary Bressler re Plan status and withdrawal	0.10	25.00	CMG

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	Review notice of withdrawal of Plan	0.10	25.00	CMG
	Review memos to/from Pat Sheehan, Gary Bressler re status of various construction projects, Plan issues, use of received funds	0.30	75.00	CMG
	Review letter from Pat Sheehan; Review draft declaration re employment of Aaron Shapiro and responses re same	0.25	62.50	CMG
Apr-23-21	Review memos to/from Pat Sheehan, Gary Bressler, Chase Pritchard re trust fund payments	0.25	62.50	CMG
	Receipt and review of Order re Debtor's Motion to Withdraw 1st Amended Plan; calendar deadline for Debtor to file 2nd amended plan	0.10	15.00	KLC
Apr-26-21	Telephone conference with Pat Sheehan re released retainage on New Orleans job	0.25	62.50	CMG
Apr-28-21	Review draft and final stipulation on use of cash collateral and approval of same	0.65	162.50	CMG
	Review memos to/from James McCullough, Gary Bressler, Pat Sheehan re draft, and final, cash collateral stipulation, motion and order	0.25	62.50	CMG
	Telephone conference with Pat Sheehan re terms of use of cash collateral and presentation to court	0.20	50.00	CMG
	Review hearing notice	0.20	50.00	CMG
Apr-29-21	Review COS re emergency motion	0.15	37.50	CMG
	Review memo from UST re MORs delinquency	0.10	25.00	CMG
	Review memos to/from Pat Sheehan, Chase Pritchard re hearing and trial prep	0.10	25.00	CMG
Apr-30-21	Telephone conference with Paul Murphy re hearing results, Hancock position	0.20	50.00	CMG
	Attended telephonic hearing re Emergency Motion to Approve Stipulation and Use Cash Collateral	0.55	137.50	CMG

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	Review numerous memos to/from all counsel on emergency motion; Review comments on emergency motion and order re lien priority and reservation of rights; Review final form of order	0.55	137.50	CMG
	Review minute entry	0.05	12.50	CMG
	Receipt and review of Notice re Debtor's Application to Employ Special Counsel Aaron Shapiro; calendar objection deadline	0.10	15.00	KLC
May-03-21	Review memo from Kristi Johnson re mediation	0.10	25.00	CMG
May-04-21	Review memos to/from Kristi Johnson re mediation roster	0.10	25.00	CMG
	Review memos to/from Kristi Johnson re mediation logistics	0.20	50.00	CMG
May-05-21	Review memo from Gary Bressler re changes in Delaware litigation to parties defendant	0.25	62.50	CMG
May-06-21	Review memos to/from Kristi Johnson re special counsel status	0.20	50.00	CMG
May-07-21	Review memos to/from Kristi Johnson, Pat Sheehan re Amended Plan	0.20	50.00	CMG
	Review memos to/from Ms. Marbury re MOR	0.05	12.50	CMG
May-10-21	Review application to employ special counsel	0.45	112.50	CMG
	Review motion to shorten time for objections to amended application to employ special counsel	0.25	62.50	CMG
May-12-21	Review memos to/from Pat Sheehan re pre-petition debt to special counsel	0.20	50.00	CMG
May-13-21	Review motion to withdraw application; Review memos to/from Kristi Johnson, Pat Sheehan re reasons for withdrawal of application to employ	0.25	62.50	CMG
May-14-21	Review memos to/from Pat Sheehan re reasons for withdrawal of application to employ	0.25	62.50	CMG
	Receipt and review of Notice re Debtor's Fee	0.10	15.00	KLC

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**Application for Special Counsel; calendar  
objection deadline**

May-17-21	Review order on show cause	0.10	25.00	CMG
May-18-21	Review notice of confirmation hearing	0.20	50.00	CMG
	Review clerk's letter to counsel for Debtor	0.10	25.00	CMG
	Conference with KLC re continuing confirmation hearing due to scheduling conflict and clerk's response	0.20	50.00	CMG
	Telephone conferences with Pat Sheehan re scheduling issues and confirmation continuance	0.25	62.50	CMG
May-20-21	Review notice from SureTec Insurance Company	0.10	25.00	CMG
	Receipt and review of Order Fixing Time for Filing Acceptances/Rejections re Debtor's 2nd Amended SubV Plan; calendar hearing date, objection deadline and ballot deadline to trigger preparation of hearing folder	0.15	22.50	KLC
May-24-21	Review COS re plan	0.10	25.00	CMG
Jun-04-21	Review hearing notice	0.20	50.00	CMG
Jun-08-21	Telephone conference with Pat Sheehan re non-impairment of creditors and plan impact	0.20	50.00	CMG
	Review Gary Bressler response re impaired creditors	0.20	50.00	CMG
Jun-09-21	Review memos to/from counsel re impairment and related voting issues	0.10	25.00	CMG
Jun-10-21	Receipt and review of hearing notice re Debtor's Motion to Approve Stipulation re Special Counsel; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	22.50	KLC
Jun-16-21	Review Whitney POC	0.65	162.50	CMG
Jun-20-21	Review memos to/from Ms. Marbury re appointment to select mediator, plan issues	0.20	50.00	CMG

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Jun-22-21	Review memos to/from Chase Pritchard, Nathan Bosio, Pat Sheehan re treatment of GEDA claims in plan and post-confirmation	0.20	50.00	CMG
	Review conditional ballot acceptances and letter from Kristi Johnson re same	0.25	62.50	CMG
	Assist CMG drafting Motion to Continue Confirmation Hearing	0.10	15.00	KLC
Jun-24-21	Review memos to/from Pat Sheehan, David DeBruin re mediation and related issues for confirmation	0.20	50.00	CMG
	Review memos to/from Ms. Marbury, Christy Cannette re video connections and objection deadline to plan	0.10	25.00	CMG
Jun-25-21	Telephone conference with Paul Murphy's staff re status of Hancock objection	0.15	37.50	CMG
	Dictation of motion to continue	0.25	62.50	CMG
	Review memos to/from Kristi Johnson, Ray Lemisch re status conference and confirmation reset	0.20	50.00	CMG
	Review notice of hearing on motion to continue	0.20	50.00	CMG
	Dictation of motion for status conference; Review and revision of same	0.50	125.00	CMG
	Telephone conference with Christy Cannette re reset of various hearings and status of same	0.20	50.00	CMG
	Review notices and reset orders	0.20	50.00	CMG
	Review memos to/from Ms. Marbury re feasibility, plan objection, likelihood of a consensual plan and related issues	0.30	75.00	CMG
	Review notice and order re GEDA motion	0.25	62.50	CMG
	Review late filed MORs	0.10	25.00	CMG
	Receipt and review of hearing notice re Motion to Continue Confirmation Hearing; calendar hearing date to trigger preparation of hearing folder	0.10	15.00	KLC

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	Assist CMG revising Motion to Continue Confirmation Hearing	0.10	15.00	KLC
	Assist CMG drafting and revising Joint Motion for Status Conference	0.30	45.00	KLC
	Receipt and review of hearing notice re Joint Motion for Status Conference; calendar hearing date to trigger preparation of hearing folder	0.10	15.00	KLC
Jun-27-21	Review memos to/from Pat Sheehan re feasibility issues	0.20	50.00	CMG
Jun-28-21	Telephone conference with Mr. Sheehan re feasibility issues	0.20	50.00	CMG
	Second telephone conference with Mr. Sheehan re feasibility, continuance	0.25	62.50	CMG
	Conference call with Mr. Sheehan, Mr. Pritchard re feasibility, reasons for losses	0.40	100.00	CMG
	Review May MOR	0.45	112.50	CMG
	Review ballot certification	0.15	37.50	CMG
	Review memo from Mr. Sheehan re Gloucester Terminal demand	0.10	25.00	CMG
Jun-29-21	Review memos to/from counsel re continuance	0.25	62.50	CMG
Jun-30-21	Review motion to continue	0.35	87.50	CMG
	Review reset order	0.20	50.00	CMG
	Dictation of orders on motion to continue and for scheduling conference; Review and revision of same	0.20	50.00	CMG
	Review minute entries	0.15	37.50	CMG
	Receipt and review of Minute Entry re Motion to Continue Confirmation Hearing; calendar deadline to submit order	0.10	15.00	KLC
	Receipt and review of Minute Entry re Motion	0.10	15.00	KLC

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to Set Status Conference; calendar deadline to submit order

	Receipt and review of Order Resetting Confirmation Hearing; calendar hearing date to trigger preparation of hearing folder	0.10	15.00	KLC
Jul-01-21	Review order approving second stipulation and employment of counsel	0.20	50.00	CMG
	Assist CMG drafting Order re Joint Motion for Status Conference	0.15	22.50	KLC
	Assist CMG drafting Order re Motion to Continue Confirmation Hearing	0.15	22.50	KLC
Jul-12-21	Telephone conference with Pat Sheehan re new bond claimant plan language, current status of bank negotiations	0.20	50.00	CMG
	Review memos to/from Pat Sheehan; Review changes requested by USSIC and order confirming plan	0.30	75.00	CMG
Jul-13-21	Update/preparation of document management control (subfiles and pleadings)	0.30	45.00	KLC
Jul-15-21	Review objection to claim filed by the Debtor	0.35	87.50	CMG
Jul-16-21	Receipt and review of Debtor's Notice and Objection to World Scaffold's Proof of Claim #11; calendar objection deadline	0.10	15.00	KLC
Jul-20-21	Review response to objection to claim of World Scaffold, LLC	0.25	62.50	CMG
	Receipt and review of hearing notice re Debtor's Objection to POC #11 of World Scaffold; calendar hearing date to trigger preparation of hearing folder	0.10	15.00	KLC
Jul-29-21	Review memo from Gary Bressler re confirmation order language	0.20	50.00	CMG
Aug-02-21	Review memos to/from Abby Marbury re logistics for confirmation hearing	0.10	25.00	CMG
	Review memo from KLC approving request to participate by video and information concerning exhibits and examination of witnesses as a result	0.10	25.00	CMG

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Aug-03-21	Review amended ballot certification	0.20	50.00	CMG
	Review memo from Pat Sheehan re outline of terms proposed to Hancock to resolve its objections to plan	0.20	50.00	CMG
Aug-04-21	Review memo from Pat Sheehan re class voting	0.25	62.50	CMG
	Telephone conference with Pat Sheehan re Hancock status and terms, A/R collection, feasibility and plan confirmation, Trustee position post-confirmation	0.25	62.50	CMG
	Review Pat Sheehan application for compensation, notice and COS	0.25	62.50	CMG
	Review memos to/from Pat Sheehan; Review draft confirmation order	0.35	87.50	CMG
Aug-05-21	Review numerous memos to/from Gary Bressler, Kristi Johnson, Pat Sheehan re treatment of Mr. Bressler's client in plan and changes to be made	0.25	62.50	CMG
	Review memo from Ed Ripley approving language in plan on Paragraph 9 for GEDA	0.05	12.50	CMG
	Review memos to/from Gaston Loomis; Review proposed changes to confirmation orders re Mr. Loomis' requests	0.20	50.00	CMG
	Review comments on draft confirmation order; Review and approve draft confirmation order	0.40	100.00	CMG
	Dictation of report in support of plan; Review and revision of same	0.75	187.50	CMG
	Review June MOR	0.35	87.50	CMG
	Review memo from Pat Sheehan and review revised confirmation order	0.30	75.00	CMG
	Review memos to/from Ray Lemisch re confirmation order agreement	0.20	50.00	CMG
	Review memos to/from Pat Sheehan; Extensive review of proposed confirmation order	1.00	250.00	CMG

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	Receipt and review of Notice re Debtor's 2nd Fee Application for Attorney Pat Sheehan; calendar objection deadline	0.10	15.00	KLC
	Review file and court docket re: 8/6/21 hearing on Debtor's 2nd Amended SubV Plan; prepare hearing folder for same	0.40	60.00	KLC
	Review file and court docket re: 8/6/21 hearing on Debtor's 2nd Amended SubV Plan; prepare hearing folder for same	0.35	52.50	KLC
	Assist CMG drafting and revising Report in Response to Debtor's 2nd Amended SubV Plan	0.50	75.00	KLC
Aug-06-21	Telephone conference with Mr. Sheehan re 1191(a) or (b) confirmation	0.20	50.00	CMG
	Review file; Outline presentation; Attended confirmation hearing	1.00	250.00	CMG
	Review minute entry	0.10	25.00	CMG
	Review witness & exhibit list	0.10	25.00	CMG
	Telephone conference with Mr. Sheehan re hearing results	0.20	50.00	CMG
Aug-13-21	Review and revision of itemizations	0.50	125.00	CMG
	Dictation of application for compensation	0.65	162.50	CMG
	Assist CMG reviewing and revising itemizations	0.30	45.00	KLC
Aug-15-21	Dictation of notice re application for compensation	0.20	50.00	CMG
Aug-16-21	Dictation of COS re application for compensation	0.15	37.50	CMG
Aug-17-21	Review order on Plan; Review memo from Pat Sheehan re selection of mediator	0.20	50.00	CMG
Aug-18-21	Assist CMG drafting and revising CMG's 1st Fee Application, Notice, Certificate of Service and Order re same	0.65	97.50	KLC
	Assist CMG reviewing and revising itemizations	0.30	45.00	KLC

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Receipt and review of Order Confirming Debtor's 2nd Amended SubV Plan; calendar various deadlines	0.20	30.00	KLC
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Totals	77.96	\$18,480.00
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**DISBURSEMENTS**

Oct-14-20	Long Distance	2.13
Nov-05-20	Long Distance	2.13
Dec-21-20	Long Distance	3.00
Jan-05-21	Long Distance	2.00
Jan-18-21	Long Distance	2.13
Feb-08-21	Long Distance	2.00
Feb-23-21	Long Distance	2.13
Apr-16-21	Long Distance	2.00
	Long Distance	2.00
Apr-20-21	Long Distance	2.00
Apr-21-21	Long Distance	3.00
Apr-26-21	Long Distance	2.00
Jun-25-21	Long Distance	2.00
Aug-04-21	Long Distance	2.00
Aug-06-21	Long Distance	2.13
	Parking	3.50
	Long Distance	2.13
	Totals	\$38.28

<b>Total Fee &amp; Disbursements</b>	<b>\$18,518.28</b>
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<b>Balance Now Due</b>	<b>\$18,518.28</b>
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**SUMMARY BY TIMEKEEPER**

TIMEKEEPER	RATE	HOURS	AMOUNT
Craig M. Geno	\$250.00	67.86	\$16,965.00
Kathryn L. Carter	\$150.00	9.80	\$1,470.00
Sherry Lynn Purvis	\$150.00	0.30	\$45.00

TAX ID Number 80-0084265